REMARKS/ARGUMENTS

These remarks are made in response to the final Office Action of February 3, 2004 (Office Action). As this response is timely filed within the three-month shortened statutory period, no fee is believed due

In paragraphs 1-2, claims 1, 2, 5, and 6 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,615,296 to Stanford *et al.* (Stanford). In paragraphs 3-4, claims 3 and 4 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Stanford in view of U.S. Patent No. 6,192,344 to Lee *et al* (Lee).

In response, claim 1 has been amended to clarify that the present invention includes a plurality of speech technology modules, each including a speech recognition engine (SRE) and a text-to-speech engine (TTSE). Additionally, claim 5 has been amended to clarify that the call type identifier pertains to whether the call is conducted over landline, mobile, or IP telephony.

Prior to addressing the rejections on the art, a brief review of the Applicants' invention is appropriate. The present invention provides an interactive voice response (IVR) system that includes a plurality of speech technology modules. Each speech technology module can include a SRE and a TTSE. Each of the speech technology modules can be suited for a particular interaction environment property, such as the locale of a caller or the language spoken by the caller. Based upon the environment property of an interaction with a caller, a speech technology selection module can select one of the speech technology modules from the plurality of modules to be used by the application. As such, the present invention can select a speech technology module that is particularly suited to the interaction with the caller.

Turning to the rejections on the art, claims 1, 2, 5, and 6 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Stanford. As amended, claim 1 now recites that the IVR system includes a plurality of speech technology modules where each module includes a SRE and a TTSE. As noted, Stanford discloses only a single recognition server 108 (*See* FIG. 1).

Regarding the "Response to Arguments" section of the Office Action, the context voice response files 400 are not SREs or TTSEs Rather, the context voice response files 400 are digital recordings of voice responses. Stanford, at column 11, lines 66-67, states that the context voice response files 400 "include a plurality of files 404". At column 12, lines 1-15, Stanford

discloses that one of a plurality of stored digital voice responses is selected for playback by the voice response output 402. Accordingly, the context voice response files 400 appear to be digital recordings of voice responses that are stored and selectively played to a caller based upon an identified context. Thus, the context voice response files 400 are not tasked with recognizing speech

Notably, considering that Stanford plays voice response files to callers, it appears that Stanford does not disclose the use of a TTSE. Instead, Stanford plays one or more prerecorded audio segments to callers based upon a detected context.

Further, the context prompt display files 410 clearly are not speech related as is stated in the Office Action. At column 12, lines 24-25, Stanford states that "[t]he context prompt display files 410 include a plurality of display files 414." Subsequently, at column 12, lines 29-32, Stanford states that "[t]he context prompt display file 414 which is selected, is output to the display 208. This typically will display a menu of visual prompts which the user can read and select from." (emphasis added)

In addition, Stanford does not teach a speech technology selection module that selects one of the plurality of speech technology modules having a SRE and a TTSE.

Accordingly, withdrawal of the 35 U.S.C. § 102(b) rejection with respect to claims 1, 2, 5, and 6 is respectfully requested.

Claims 3 and 4 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Stanford in view of Lee. The Examiner concedes that Stanford does not explicitly disclose an environment property of a language identifier and a regional identifier. The Examiner contends, however, that it would have been obvious to one having ordinary skill in the art to include language identifiers and regional identifiers as taught by Lee in the voice response system of Stanford for the purpose of providing an efficient messaging system for different languages without re-compiling the messaging program or re-writing messages in another language.

Applicants reiterate that Lee, like Stanford, fails to disclose a plurality of speech technology software modules, each module having a SRE and a TTSE. The present invention can select one of a plurality of different speech technology modules having a SRE and a TTSE based upon an environment property which relates to a language or a region identifier.

U.S. Appln No. 09/641,449
Amendment Dated Apr. 5, 2004
Reply to Office Action of Feb. 3, 2004
Docket No 6169-179
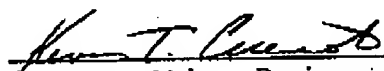
IBM Docket No. GB9-2000-0034US1

Applicants believe that Lee teaches away from the present invention because Lee teaches a single language server. As such, Lee cannot select one of a plurality of speech technology modules, as claimed, based upon language or region.

As neither Stanford, Lee, nor any combination thereof teaches or suggests the Applicants' invention as claimed, withdrawal of the 35 U.S.C. § 103(a) rejection with respect to claims 3 and 4 is respectfully requested.

The Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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